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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

Telephone: (801) 524-5682

VS.

SETH WILLIAM LAW,

Defendant.

INDICTMENT

Count I: 18 U.S.C. § 922(a)(1)(A), Dealing in Firearms Without a License; Counts II-VIII: 18 U.S.C. § 922(a)(6), False Statements During the Acquisition of Firearms

Case: 1:22-cr-00101

Assigned To: Nielson, Howard C., Jr

Assign. Date: 10/5/2022

The Grand Jury Charges:

COUNT I

18 U.S.C. § 922(a)(1)(A) (Dealing in Firearms Without a License)

Beginning on or about May 14, 2018 and continuing through May 27, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, all in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT II

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about November 21, 2020, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: a Beretta APX 9mm semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT III

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about January 10, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: a Girsan Regard MC 9mm semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on

ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT IV

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about March 12, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: an AHSS FXS-9 9mm semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT V

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about March 29, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: a Windham Weaponry MPC 5.56mm rifle from a licensed firearm dealer within the meaning of

Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VI

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of Firearms)

On or about April 2, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of firearms, to wit: a Tisas Sig M45 .45 caliber semi-automatic pistol and a German Sports Guns GSG-1911 .22 long rifle semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that he falsely answered "yes" on ATF form 4473 asking whether he was the actual transferee/buyer of the firearms, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VII

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about April 21, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: an Arex Delta L 9mm semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VIII

18 U.S.C. § 922(a)(6) (False Statement During Acquisition of a Firearm)

On or about May 9, 2022, in the District of Utah,

SETH WILLIAM LAW,

defendant herein, in connection with the acquisition of a firearm, to wit: a Beretta APX Carry 9mm semi-automatic pistol from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that he falsely answered "yes" on

ATF form 4473 asking whether he was the actual transferee/buyer of the firearm, and, as he then knew, his answer was untrue, all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction for any offense violating 18 U.S.C. § 922 or 924, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offense, including but not limited to:

- Taurus 605 .357 caliber revolver, s/n DS42880
- Zastava E79 9mm semi-automatic pistol, s/n 1480
- HS Produkt Hellcat 9mm semi-automatic pistol, s/n BB259926
- Ruger LCP .380 caliber semi-automatic pistol, s/n 371844849
- Ruger LCP Max .380 caliber semi-automatic pistol, s/n 380905634
- North American Arms NAA22 .22 caliber revolver, s/n E451119
- Beretta 92X 9mm semi-automatic pistol, s/n 92X0049802
- Sig Sauer P320 9mm semi-automatic pistol, s/n 58J409119
- Browning Winchester XPR .243 caliber rifle, s/n 357ZT22681
- Savage Arms B22 .22 caliber rifle, s/n 3833334
- Ruger Charger .22 caliber semi-automatic pistol, s/n 491-02016
- Savage Arms Mark II .22 caliber rifle, s/n 3099476
- Grand Power K100 9mm semi-automatic pistol, s/n GKA0091
- Keltec PMR-30 9mm semi-automatic pistol, s/n 3099476
- HS Produkt XDM Elite 9mm semi-automatic pistol, s/n BA535494
- HS Produkt XDM Elite 9mm semi-automatic pistol, s/n 66B853785
- German Sports Guns GSG-1911 9mm semi-automatic pistol, s/n A918028
- Ruger AR-556 .556 caliber rifle, s/n 85877810
- Hatsan Arms Escort 12 gauge shotgun, s/n 902490
- Hatsan Arms Escort 12 gauge shotgun, s/n 199787
- Heritage Barkeep .22 caliber revolver, s/n 1BG571488
- Walter PDP 9mm semi-automatic pistol, s/n FDD3129
- Walther PPS 9mm semi-automatic pistol, s/n AX6547
- Ruger SR-22 .22 caliber semi-automatic pistol, s/n 360-25047

- Heritage Rough Rider .22 caliber revolver, s/n 1BH178591
- Zastava Z-Pap M70 7.62x39 mm rifle, s/n Z7016332
- Ruger American rifle (unknown caliber), s/n 690255752
- Ruger Charger .22 caliber semi-automatic pistol, s/n 49043453
- Benelli Nova 20 gauge shotgun, s/n BA009398
- Ruger American Rimfire .22 caliber rifle, s/n 833-46444
- Weatherby Element 20 gauge shotgun, s/n RM017667
- Sarsilmax SAR 9mm semi-automatic pistol, s/n T1102-17FB03294

A TRUE BILL:

FOREPERSON OF GRAND JURY

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